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THOMAS M. COULD
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF TENNESSEE

Kenneth K. Wooten

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Builders Transportation Company

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Kenneth K. Wooten
(name of plaintiff)

is a citizen of the United States and resides at 5913 Belle Pointe
(street address)

Southaven

(city)

U.S.

(country)

MS

(state)

38672

(zip code)

662-654-17878

(telephone number)

3. Defendant Builders Transportation
 (defendant's name)
 lives at, or its business is located at 3710 Tulane Memphis, TN 38116
 (street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at
3710 Tulane U.S.
 (street address)
Memphis U.S. TN 38116
 (city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of
 this complaint on or about 22 10 2012
 (day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment
 Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this
 complaint on or about _____
 (day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity
 Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this
 complaint on or about 23 5 2013
 (day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue,
 which was received by plaintiff on 15 11 2014. (Attach a copy of the notice to
 this complaint.)

9. Because of plaintiff's (1) race, (2) ✓ color, (3) sex, (4) religion,
 (5) national origin, defendant

(a) failed to employ plaintiff.

(b) ✓ terminated plaintiff's employment.

(c) failed to promote plaintiff.

(d) _____

10. The circumstances under which defendant discriminated against plaintiff were as follows: Was terminated and written up for no reason. Charged that I had preventable accident which the proof of the ticket documented. Which drivers have had several accidents and that were not terminated. They falsely reported this to D.A.C.

11. The acts set forth in paragraph 9 of this complaint

- (a) are still being committed by defendant.
- (b) are no longer being committed by defendant.
- (c) may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) Defendant be directed to employ plaintiff, or
- (b) Defendant be directed to re-employ plaintiff, or
- (c) Defendant be directed to promote plaintiff, or;
- (d) Defendant be directed to Compensate for hardship that was put forth by plaintiff.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes No

Kenneth K. Wooten
SIGNATURE OF PLAINTIFF